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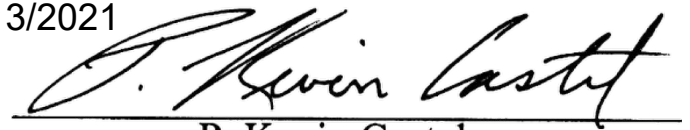
April 12, 2021

Via Email & ECF

The Honorable P. Kevin Castel
United States District Court Judge
United States District Court
500 Pearl Street
New York, New York 10007

Mr. Martinez may attend the April 21 event subject to reasonable restrictions, including starting, ending and curfew hours, set by Pretrial Services.
SO ORDERED.

Dated: 4/13/2021



P. Kevin Castel
United States District Judge

Re: *United States v. Lopez, Giovanni Martinez, et al*
21 Cr 234

Dear Judge Castel:

My client Giovanni Martinez, respectfully requests a modification of his conditions of bond to allow him out of his home for one evening, April 21st, to celebrate his son's sixteenth birthday. The family has planned to celebrate his son's birthday at restaurant. Mr. Martinez has a special bond with his son, particularly since Covid-19 because Mr. Martinez has overseen his son's home schooling.

On March 12, 2021, Mr. Martinez was released on a \$50,000 PRB, cosigned by two financially responsible persons, travel limited to SDNY/EDNY, surrender of travel documents. A condition of his bond is home detention, subject to electronic monitoring, but he is permitted out of his home to seek employment, grocery shopping, and other necessary errands. His Pretrial Officer Josh Rothman confirmed that Mr. Martinez has been completely compliant with his conditions of his bond but due to his office's policy with respect to defendant on home detention, he cannot consent to Mr. Martinez' request for this one-time modification of his bond for a few hours during the evening of April 21st. Assistant United States Attorney Micah Ferguson does not take a position with respect to Mr. Martinez' request. Mr. Martinez has provided Pretrial Officer Rothman with his complete itinerary for April 21st celebration, including the address and name of the restaurant, the family members who will be attending, and the hours he will be out of his home. Mr. Martinez' plans will allow him to be home well before 11:00 PM.

Wherefore, I respectfully request grant Mr. Martinez' request for this modification of his conditions of bond for the evening of April 21, 2021.

Respectfully,

/s/

Donna R. Newman

Cc: AUSA Micah Fergenson via email & ECF

Pretrial Officer Josh Rothman via email & ECF

Giovanni Martinez via email